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# SEC Section D 'Modification Process' Review

## Request for information responses

### About this document

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This document contains the full collated responses received to the Smart Energy Code (SEC) Section D 'Modification Process' request for information (RFI).

## Question 1: Do you believe the previous Section D review's enhancements are working as expected?

Question 1			
Respondent	Category	Response	Rationale
<b>OVO Energy</b>	Large Supplier	-	<p>We view that there have been elements of the enhancements that have delivered a benefit, however some of these are limited in terms of the original intent. Therefore, the response field has been left blank as the options do not reflect our comments.</p> <p>Development Stage: We view this stage has a limited benefit as it is not able to complete a cost benefit analysis to determine if this should proceed to working group stage. We think this will be difficult to achieve given the reliance on DCC and Industry inputs and these come with cost and lengthen the timescales. We question the benefit of this stage in its current form – we think this needs further consideration of how to get wider engagement and input from Industry to ensure that there is validation of the potential issue, its proliferation and support.</p>
<b>Waters Wye Associates</b>	N/A	No	Processes brought in to require organisation to sign documents to attend meeting is restricting attendance.
<b>Western Power Distribution</b>	Network Party	Yes	<p>We believe that the introduction of the Change Sub-Committee has been successful, with them pushing back modifications that aren't yet ready to enter the refinement phase or are proposing changes that don't actually impact the SEC. They are also ensuring there is a clear understanding of the issue that is trying to be resolved before the change progresses from a draft proposal.</p> <p>We also believe that the Change Board has been beneficial in ensuring there is a clearer and more controlled manner for signing off DCC IA costs and also challenging these where</p>

Question 1			
Respondent	Category	Response	Rationale
			appropriate. It also ensures a consistent view and expectation of what is acceptable and required.
<b>E.ON Energy Solutions Limited</b>	Large Supplier	-	<p>It is difficult to judge the degree to which the current process' strengths and weaknesses are due to the previous enhancements as opposed to the natural progression of the modification process as it becomes more mature.</p> <p>However, using the specific example of SECMP0015, the costs included not just the development and systems testing costs, but also all the SIT, UIT and implementation costs as if the change was implemented on it's own as a main DCC release. Clearly this is not appropriate as the change would be tested and implemented as part of a release containing additional changes. Therefore, the cost estimate should be clearly broken down into costs which are directly associated with the change (e.g. design, development, system test) and a clear sub-total of these provided, before additional "shared costs" are added.</p> <p>When the costs for SECMP0015 were questioned and reviewed, it became apparent that the two CSP's were working to very different models in terms of testing and implementation and there should be clear guidance provided in these areas to seek to achieve consistent approaches and aligned cost estimates.</p> <p>This is also an excellent example of the need to streamline processes as this has taken over four years to get to the current costs/benefits analysis stage. Consideration of benefits would definitely be helped by a workshop approach – to help align areas of benefits and method of assessment across DCC users.</p>
<b>EDF Energy Customers Ltd</b>	Large Supplier	Yes	<ul style="list-style-type: none"> <li>The current change process is working better than the previous process, but there are opportunities for it to be improved further.</li> </ul>

Question 1			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> <li>The CSC process is resulting in better quality changes going to the working group – and has stopped some changes from being progressed that would otherwise have taken up time and resource unnecessarily.</li> <li>However, some changes seem to hang around in the development phase for a while, which brings into question whether they should have been raised in the first place – or if they should progress to the Working Group phase for further development with a wider audience.</li> <li>In principle it is right that an IA is approved by the Change Board given the level of cost for some IAs, but it is not clear this is required for all IAs - there should be a threshold for Change Board approval.</li> <li>It is not clear whether the the Change Board feels it can reject an IA – they can seek clarification on the costs of the IA and challenge the business requirements, but it is not clear whether they feel that they can reject the cost entirely as not being cost-effective based on the benefits.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	Yes	They are working as expected.
<b>Utilita</b>	Large Supplier	No	<p>The previous review fell short of providing enhancements to deliver a better SEC change process. The enhancements were only minor amendments to the process compared to the fundamental changes required to deliver the improvements needed.</p> <p>Significant gaps remain that could have worked along with the enhancements after Section D review in 2018, such as:</p> <ul style="list-style-type: none"> <li>Improvement in overall efficiencies in implementing/progressing modifications in a timely manner,</li> <li>A clearer understanding of the costs behind each Impact Assessment, and</li> </ul>

Question 1			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> <li>Structured meetings to prevent overlap of conversations and outputs across forums, streamlining the modification process.</li> </ul> <p>Assessing the success or failings of modifications is important to all change processes, but Utilita would be keen to see a wider review of the change process as a whole. Only by having a broad scope will we identify and address the weaknesses in the SEC mod process and deliver the change needed to achieve an efficient and flexible modification process.</p> <p>As an overview, we suggest enhancement of SEC Section D can be best achieved by bringing attention to these 3 suggestions which we have highlighted throughout this review:</p> <ol style="list-style-type: none"> <li>1. Creation of a project management tool to help guide modifications through each stage within SECAS under a set of criteria</li> <li>2. Working on a solution for incentivising progress and good management of modifications</li> <li>3. Comparing against other industry codes to develop good governance</li> </ol>

## Question 2: Do you believe the management of the Modification Process framework could be better consolidated?

Question 2			
Respondent	Category	Response	Rationale
<b>OVO Energy</b>	Large Supplier	-	<p>We refer you to our response to question 1 regarding the efficacy of the Development Stage and CSC. The response has been left blank as the options did not seem appropriate.</p> <p>We view that the work carried out by the SEC Panel could be re-assessed with a view to delegating to the SEC Change Board. With the SEC Panel being utilised for escalation and oversight of key concerns and Modifications with material impact.</p>
<b>Waters Wye Associates</b>	N/A	-	-
<b>Western Power Distribution</b>	Network Party	Possibly	<p>We understand that there are now numerous groups involved in the change process. We feel that there is potential that the Change Board and the Change Sub-Committee could become amalgamated to be one group, and also the potential for the SEC Panel to delegate their role.</p> <p>We question whether the SEC Panel has the expertise and time to get into the detail of modifications in the same way that the designated change sub-committees do. An example of this is SECMP0015 which was converted to an MRC by the SEC Panel but the cost increase of £4 million was not highlighted and challenged.</p>
<b>E.ON Energy Solutions Limited</b>	Large Supplier	Yes	<p>Given the length of time taken to manage modifications a consolidated approach to oversight and governance would appear sensible – it could help speed up priority activities and avoid wasted time. That said, it would be important to ensure that any group which is to have consolidated oversight of the modifications has the time and expertise to devote to this.</p>

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Question 2			
Respondent	Category	Response	Rationale
<b>EDF Energy Customers Ltd</b>	Large Supplier	Yes	<ul style="list-style-type: none"> <li>It is not clear that the Panel needs to be so involved in the process or what value that they add to the progression of changes – they should delegate their powers to the Change Board and/or the CSC.</li> <li>If more powers were delegated to the Change Board, they would have a better view of the progress of changes before they come to the Change Board for decision. This would mean that the Change Board would know why the Change was raised and what the intent was – which might help when it comes to them for a vote.</li> <li>The approval of a Draft Proposal into the change process could be done by the Change Board or even the CSC – and could be done outside of the meetings by reviewing and approving the document. Once the CSC is happy that a change proposal is fit for purpose and recommends a change path, is any further approval required?</li> <li>Change Board members (or their organisations) can also participate in the Working Group meetings if they want to be directly involved in discussions regarding a change – they don't have to wait to the end of the process to make themselves aware of a change.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	No	We also believe that input from different committees (e.g. TABASC) should feed into the process, as this will help with transparency and oversight. It will also help to inform the Working Group's efforts.
<b>Utilita</b>	Large Supplier	Yes	<p>In recent months, many modification reports have been missing key pieces of information. In some cases, this has led to delays to modifications being implemented and modifications being rejected based on missing information. Attention should be given to why this is only being identified at late stages of the Reporting Phase. SECAS needs to ascertain how these issues recur alongside reviewing further consolidation.</p> <p>On other occasions, there have been duplications of conversations across committees. Arrangements should be in place for SECAS and the proposer to collaborate and discuss in</p>

Question 2			
Respondent	Category	Response	Rationale
			<p>advance what requirements are needed from each sub-committee's involvement to help guide conversations in a constructive manner. This should help to better manage and plan overall timelines of a modification.</p> <p>All framework committees should have distinct and valuable roles in the modification process with reduced overlap. Utilita would like to see a clear and unambiguous division of responsibilities, as there needs to be a clearly delineated division for all committees to succeed in their role.</p> <p>Where or if committees are unable to deliver on management of the framework, alternative options should be investigated to improve and consolidate this process. For example: assessing other codes' frameworks -for instance, the REC has been designed with Code Managers and a dedicated REC Change Panel. The Code Managers are then able to take responsibility and lead the discussions to progress modifications through the framework whilst the REC Change Panel has delegated responsibility from the RECCo Board for all change related decisions.</p>



### Question 3: How do you think the development of business requirements could be enhanced?

Question 3		
Respondent	Category	Response and rationale
<b>OVO Energy</b>	Large Supplier	<p>We think that this area would be improved by calling upon the sub-committees and TBEC that have expertise and knowledge of requirements development.</p> <p>We view that it should be possible to include additional requirements that could be optional and to request Impact Assessments on these. We believe that the IA breakdown should then support solution options to enable Industry to consider the appropriate option to take forward that balances benefits with cost and provides potential flexibility.</p>
<b>Waters Wye Associates</b>	N/A	-
<b>Western Power Distribution</b>	Network Party	<p>We think that there could be some improvement in the area of business requirements, however we don't feel that there can be a 'one size fits all' solution. There are occasions when the business requirements appear to be more of a solution, when actually we believe that the business requirements should be as high a level statement as possible, and then the Preliminary Assessment should provide different solutions available. We appreciate that there are occasions where the DCC might require some specific details but we feel that this should be the exception rather than the normal.</p> <p>We question if there is a possibility that the Proposer and Change Sub-Committee should develop the initial business requirement statement that could then be developed/expanded on by the Working Group if necessary.</p> <p>Sometimes, when the requirements are clear, the IA is returned with a different solution to the requirements specified. If the Working Group ask for specific requirements then the IA should provide that although happy for it to highlight alternatives where applicable.</p>

Question 3		
Respondent	Category	Response and rationale
<b>E.ON Energy Solutions Limited</b>	Large Supplier	<p>Ensuring DCC is involved early on is useful, as it helps promote a sense of pragmatism among proposers as they better understand what it is feasible to deliver. At the same time, it ensures that DCC is fully aware of the reasons why a change is being proposed.</p> <p>In addition, discussions between the proposer and DCC outside of the formal working group sessions could be used to good effect to try to bring a potential solution for others to review – at the moment the group has to look at requirements and then SECAS takes it away for analysis with DCC without proposer involvement. More direct communication between DCC and other interested parties could happen with SECAS acting in a light-touch, facilitation role.</p>
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>It must be possible to get costs for optional or 'nice to have requirements' as these options help to shape the final solution by understanding the most cost-effective approach to a problem. SECMP0077 is a good example of a 'nice to have requirement' (including the Suspended status) that was only worth doing if the cost was low enough.</li> <li>Costing options for solutions might also be useful if someone wants to raise an alternative solution with those optional elements in.</li> <li>If you don't enable options to be costed you could have two similar changes which need to be fully costed instead – and you could in theory end up in the position where a proposer might need to raise an alternative to their own change in order to get both options costed.</li> <li>An example is MP121 – the solution (whether or not to use the DCC's SSI or to use e-mail) is dependent on the costs of those two options; they both address the problem.</li> <li>There needs to be clarity on the process for agreeing business requirements and the level of granularity required in those requirements – especially when it comes to DCC system impacting changes.</li> <li>More atomic requirements and a MOSCOW analysis of those requirements might help in developing better quality solutions.</li> </ul>

Question 3		
Respondent	Category	Response and rationale
		<ul style="list-style-type: none"> <li>Are business requirements captured for every change or just for DCC system impacting changes – as part of the change process is there a check that a SEC only change delivers the business requirements for that change?</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	The basic process is working in a satisfactory manner, but we also think an ongoing risk of scope creep and cost inflation exists.
<b>Utilita</b>	Large Supplier	<p>The development of business requirements could be better enhanced by:</p> <ul style="list-style-type: none"> <li>Use of Business Analyst (BA) skills for SECAS to facilitate and lead</li> <li>Review of the consistency and efficacy of BA work done</li> <li>Highlighting the Minimum Viable Product (MVP) for the business requirements</li> <li>Highlighting 'optional' requirements impact on the DCC's IA</li> </ul> <p>Through relaying our own experience, business requirements have been developed by the proposer with little input from SECAS. The current approach does not deliver a robust business requirement specification due to missing technical experience and project management skills that are often displayed best through a BA role. The Proposer needs added support from SECAS to best define fully developed business requirements that are consistent for all modifications.</p> <p>Flagging the MVP and 'optional' business requirements is necessary to understand possible viable options for choosing a solution. If the inclusion of such requirements is a significant driver of the delays, then perhaps restricting the scope of proposals to baseline requirements is the only solution. While accurate costs may not be possible at this stage, if an indication is possible, that is helpful. For example, using external research sources or previous mod costs as some evidence base against which to estimate costs of the options.</p>

## Question 4: How do you believe Sub-Committees could better input to solution development?

Question 4		
Respondent	Category	Response and rationale
<b>OVO Energy</b>	Large Supplier	<p>We think that this area would be improved by calling upon the Sub-Committees and TBEC that have expertise and knowledge of requirements and solution development.</p> <p>We would like to understand the movement of work from under the Transitional Governance (TBDG and TSIRS) across to the Sub-Committees aligned to these groups. We would welcome more information on how this is progressing and what that will look like in relation to Section D. Noting the Terms of Reference for those Sub-Committees and TBEC are different.</p>
<b>Waters Wye Associates</b>	N/A	-
<b>Western Power Distribution</b>	Network Party	We question whether all the Sub-Committees give appropriate time and thought into the necessary change proposals, or whether in meetings they are just given an update. We wonder if the agenda item might need to be extended in some instances, with clear aims and objectives given ahead of the meeting for what questions the Sub-Committee need to answer.
<b>E.ON Energy Solutions Limited</b>	Large Supplier	Sub-committees could be used to identify subject matter experts from different organisations and highlight particular modifications where they could provide input – it is noted that often the number of people at a working group meeting contributing on a particular modification is lower than would be expect (e.g. one or two energy suppliers where it is something that would affect all suppliers).
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>There needs to be further clarity on the role of Sub-Committees and how they feed into the development of a change – especially regarding how comments get formally fed back and incorporated into a solution.</li> <li>Sub-Committees often have comments or may be interested in a change, but it is not clear what weight these comments have, or what powers Sub-Committees have to influence a change,</li> </ul>

Question 4		
Respondent	Category	Response and rationale
		<ul style="list-style-type: none"> <li>What powers (if any) do or should sub-committees have in relation to a change – for example could the SSC stop a change if they felt it compromised security – or can they just express concern and hope that parties take their view on board when voting?</li> <li>There needs to be further clarity on how and when the sub-committees are involved in the change process.</li> <li>We need clarity on the role of TABASC in the change process and what say they have in shaping a change; maybe they should they be involved at the start of the process to help shape requirements and solutions and ensure they are aligned to the Technical and Business Architectures.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	We believe it is essential for the various sub-committees to input to the process through their insight and advice; especially important where there may be little evidence of wider industry engagement in the process. SECAS needs to ensure that all feedback from the sub-committees is fed back to both the Working Group and the Change Board.
<b>Utilita</b>	Large Supplier	<p>The more Sub-Committees are involved in each case, the more complex this process will become. By simply involving other committees in the process this will further elongate the process for raising and progressing modifications. In our experience, sub-committee involvement has done little to develop solutions efficiently and, in some cases, has created further delays for modifications.</p> <p>Ultimately, when it comes to finding a solution, it is even more important to make sure SECAS focuses on asking concise and constructive questions. Often SECAS provides the summary of a modification to a sub-committee but often without directing the questions appropriately to best assess the solution that is most cost effective and benefits the customer and Industry.</p>

## Question 5: What do you consider the role of the Working Group should be?

Question 5		
Respondent	Category	Response and rationale
<b>OVO Energy</b>	Large Supplier	<p>We view the Working Group should be an independent forum of experts who are able to input and shape potential solutions to meet the problem statement.</p> <p>This also relates to our response to question 4, and the movement from Transitional to Enduring governance under the SEC. We believe this has benefits from the elimination of potential double handling and overlap between the different fora.</p>
<b>Waters Wye Associates</b>	N/A	<ul style="list-style-type: none"> <li>Allow all parties (SEC and non-SEC parties) to attend meetings and provide their input to the modification to allow it to be developed as much as possible</li> <li>To allow parties to challenge assumptions and assertions in the modification.</li> </ul>
<b>Western Power Distribution</b>	Network Party	<p>We believe that the role of the Working Group is to discuss problems and how these might be addressed, refining the solution(s) until they are at a point where industry can be asked their views. We feel that they should provide cost benefit analysis and answer queries from the DCC as well as challenging the DCC where appropriate on solution designs and costs.</p>
<b>E.ON Energy Solutions Limited</b>	Large Supplier	<p>The working group should be a place where solutions are discussed but also developed using the expertise of the people present. On early modifications (when there were specific working groups) having people in the room, discussing the different options and coming up with ideas was very helpful in shaping the work DCC had to go away and consider. Clearly this isn't relevant for every change, but for some I think that having workshops for interested parties to brainstorm and develop ideas would be useful.</p>
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>The new Working Group process largely seems to be working well – certainly one meeting per month is much easier to manage and there are is still a good level of detailed debate about the changes that are discussed.</li> </ul>

Question 5		
Respondent	Category	Response and rationale
		<ul style="list-style-type: none"> <li>The role of the Working Group should be to help define the business requirements and make sure that they fully address the problem the change was raised to address – that is where the problem statement is so important.</li> <li>The Working Group should be responsible for making sure the change solution is fit for purpose and meets the requirements – whether they agree with it being approved or not.</li> <li>The role of the Proposer in the Working Group could be clearer – are the proposers always on the call, do they need to accept the feedback from the working group or at least state why they aren't?</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	We believe the role of the Working Group, in meeting monthly, has enhanced its input to the process. It is essential for the Working Group to have the role of developing, refining and reviewing solution(s) prior to Change Board.
<b>Utilita</b>	Large Supplier	<p>The role of the Working Group is ultimately to collaborate and challenge on the construction of a modification amongst SEC Parties, SECAS and DCC. This can cover a range of discussions such as;</p> <ul style="list-style-type: none"> <li>developing part or whole solutions</li> <li>commenting on a developed solution</li> <li>developing alternate solutions</li> <li>interrogation of costs behind the modification</li> <li>a sounding board for feedback and opinion on a raised mod from SEC Parties' perspective</li> <li>provides balance for perspective on both industry and SECAS</li> <li>to hold work conducted by SECAS, DCC and Service Providers into account</li> </ul> <p>In recent months, SEC Parties have contributed to modification processes that go beyond the Working Group's responsibilities, and which should have rather been covered by SECAS. An example is MP109 where Working Group members were drawn into discussing and concluding how a modification should be</p>

Question 5		
Respondent	Category	Response and rationale
		<p>handled by SECAS. This distracts the Working Group from focusing on its more fundamental role as described above.</p> <p>The expectation of the Working Group should be to work on issues that have been thoroughly prepared at the initial development stages by the proposer and SECAS.</p> <p>The Working Group enables each SEC Party's thoughts and opinions of modifications to be heard. In the past, this has been restricted by incomplete and inflexible meeting agendas. For example, MP0067 Working Group members raised a concern over a lack of information on DCC's capacity and a need to prioritise prepayment services, neither issue was addressed before the vote.</p> <p>The Working Group should be more than a committee that gathers monthly, therefore further input during this stage should be welcomed. To encourage wider engagement, options for participation from SEC Parties should be broadened. A solution to this could be the opportunity for members to feed in their opinions by email (or similar) before the Working Group each month, for the chair to include.</p>



## Question 6: How do you believe Alternative Solutions should be raised and owned?

Question 6		
Respondent	Category	Response and rationale
<b>OVO Energy</b>	Large Supplier	<p>We think that Alternative Solutions should be able to be facilitated alongside the Proposed Solutions and be incorporated in association to the original Modification. This will enable these discussions to continue in parallel.</p> <p>We believe there is further work to be done to establish the matter of ownership. The current Modification process does not seem to encourage evaluation of alternative solutions, even if these are viewed by the Working Group to be sensible and pragmatic.</p>
<b>Waters Wye Associates</b>	N/A	-
<b>Western Power Distribution</b>	Network Party	We believe that all solutions for the same issue should be included and detailed within the initial modification and owned by the Proposer. This way all potential solutions can be consulted upon in one go to gain a full understanding of the industry views and impacts for each proposed solution.
<b>E.ON Energy Solutions Limited</b>	Large Supplier	As above, where there is a potential alternative solution SECAS organised workshops would be a great way of developing these. There are arguments for and against the working group or individual parties being able to raise and own alternative solutions and having both options could offer flexibility.
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>It needs to be drawn out more clearly in the Working Group meetings where suggested changes that the Proposer does not accept might result in alternative solutions – right now the process relies on someone in the group actively identifying where an alternative might be raised.</li> <li>It is not clear whether the SEC change process really lends itself to multiple ways of addressing the same problem and the raising of alternatives – especially where the change is a technical one that requires DCC system or Technical Specification changes that only the DCC or SECAS can really determine the detailed solution for.</li> </ul>

Question 6		
Respondent	Category	Response and rationale
		<ul style="list-style-type: none"> <li>Will the DCC highlight alternative approaches in a PIA that could then be raised as alternatives or always pick the 'best' way of resolving an issue even if there are options'?</li> <li>Should it be possible for the Proposer to suggest an alternative solution to their own change – put two options to SEC Parties and let them decide?</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	<p>Where it identifies an alternative solution when examining matters arising from a Modification Proposal, or where it considers that the DCC impact assessed solution will not be reflective of the business requirements in terms of technical coverage and/or cost, the Working Group should have the right to raise, discuss and offer its recommendation on alternative solution(s).</p> <p>We also broadly think that any of the sub-committees should be able to raise alternative solutions for the Working Group to consider. The Change Board should also have the right to send a Modification Proposal back to the Working Group for additional work on an alternative solution where it believes this to be necessary and where such alternative solution was previously identified by a relevant sub-committee or the Working Group itself.</p> <p>While the Proposer owns the original Change, there may be a strong case for vesting 'ownership' of an alternative solution in the Working Group; however, as the proposer has the right to withdraw, it would seem incongruous if such right did not also extend to the alternative.</p>
<b>Utilita</b>	Large Supplier	<p>Utilita would support the development of clearer guidelines for Alternative Solutions in the Modification Process. This includes creating awareness for SEC Parties on when and how Alternative solutions can be raised.</p> <p>We believe an Alternative Solution can and should be raised at any point before the modification is in the voting process, as long as it provides a solution to the proposed issue and aligns with one or more of the SEC Objectives.</p> <p>Alternative Solutions should be owned and managed separately by the Alternative Proposer and be voted upon separately by Working Group members before advancing.</p>

Question 6		
Respondent	Category	Response and rationale
		Finally, the Alternative Solutions process needs SECAS to support Parties in knowing that option is available and also in raising and managing alternates.

## Question 7: Do you believe the DCC Assessment process could be streamlined?

Question 7			
Respondent	Category	Response	Rationale
<b>OVO Energy</b>	Large Supplier	Yes	We think that the process could be streamlined by meeting the SLA set out currently in SEC, with financial repercussions in the event of failure. This could be tied to OPR. There could be a mechanism to request specific extensions with rationale to the SEC Panel, if this is required.
<b>Waters Wye Associates</b>	N/A	-	-
<b>Western Power Distribution</b>	Network Party	Yes	We feel that the DCC Assessment process could definitely be improved as it still feels that there are occasions when getting a suitable impact assessment takes too long. We wonder if there might be instances where the change could progress straight to an IA, if it met certain requirements for being straight forward and would be under a certain cost.
<b>E.ON Energy Solutions Limited</b>	Large Supplier	Yes	The process needs to be flexible to the needs of different modifications. Often parties simply want a view of whether a solution is feasible and a rough order of magnitude cost so that they can decide whether it is worth progressing, so getting a view of the full cost (even if it is a rough cost for later stages) early on is worthwhile.
<b>EDF Energy Customers Ltd</b>	Large Supplier	Yes	<ul style="list-style-type: none"> <li>The timescales seem to be far too long and the quality of the estimate in a PIA is very poor – a range of £150k to £350k as seen in a recent PIA is almost meaningless when it comes to assessing business cases as the range is so broad relative to the cost.</li> <li>The main value of a PIA seems to be getting the estimated cost of an IA – which is then far too high in proportion to the cost of a change; in many cases up to 10% of the development cost.</li> </ul>

Question 7			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> <li>One problem is that there seems to be no such thing as a simple change when it comes to the DCC systems – even small changes cost tens of thousands of pounds and so need some scrutiny.</li> <li>It is not always clear what the actual costs will be even following an IA as the DCC will assume the change is standalone for costing purposes, which is not reflective of reality – in which case the high cost of an IA isn't actually resulting in better decision making based on accurate cost information.</li> <li>Industry parties need to have robust cost information to be able to make decisions on changes – and shouldn't have to pay so much or wait so long to get that information.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	Yes	<p>On occasion we have seen a huge cost inflation between PIA and FIA, as well as initial large PIA costs, which has led to significant further rounds of discussion. There is an appeal process at Change Board, but typically these large costs get fed through Working Group back to Change Board, to Panel and Ofgem, then back to Working Group. This is inefficient. We believe that additional oversight is needed where large, possibly unwarranted, costs are involved, for example a “pre-Change Board” or ad hoc Change Board. If costs are considered unwarranted, then the matter could be deferred to the Authority for an early determination as to whether the proposal should be permitted to progress any further.</p>
<b>Utilita</b>	Large Supplier	Yes	<p>Lately, the DCC Assessment process has been under a lot of scrutiny for reasons connected to IA cost and internal delays.</p> <p>Utilita considers some of the issues to be that:</p> <ul style="list-style-type: none"> <li>there are currently no incentives for DCC for keeping deadlines, nor any repercussions for the DCC when deadlines are not kept</li> </ul>

Question 7			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> <li>DCC Service Provider prices are not inspected and challenged - it appears there is no mechanism to formally do so</li> <li>There are further reviews of costing for PIA and IA on IRPs that have already gone under DCC analysis through TSIRS which duplicates the costs DCC charge for conducting and undertaking an IA with little additional benefit to industry</li> <li>DCC provides only a single quote - there should be a detailed breakdown of full IA costs for transparency and to ensure the best information is provided to make a fully informed decision, including, for example, the options for scaling back a solution based on the breakdown of the costs.</li> </ul> <p>PIA and IA timelines are too long, such that modifications on system changes can take years to complete. This means that by the time implementation comes about (and therefore the time when industry has to pay for the mod/change in question), the pricing is no longer accurate because there have been many other changes since that time of initial IA and PIA which impact the price.</p>

## Question 8: How do you believe Parties can most effectively input to the development of a modification across the framework?

Question 8		
Respondent	Category	Response and rationale
<b>OVO Energy</b>	Large Supplier	We agree that it is important to continue with the consultations from the Working Group to present the proposed solution(s). We believe that there would be greater engagement by Industry if there was greater transparency on how responses were considered by the Working Group and specific feedback provided.
<b>Waters Wye Associates</b>	N/A	Be allowed to attend and send representatives who may not be Party employees. By default there should be no restriction on who can attend a meeting unless the discussion has security implications.
<b>Western Power Distribution</b>	Network Party	As it currently stands with Working Groups and consultations we feel that it allows opportunity for industry to have an input into the modification.
<b>E.ON Energy Solutions Limited</b>	Large Supplier	As a supplier that is particularly heavily involved in modifications, it is difficult to say how more parties can get involved. However, the comments above on solution development and the use of workshops to develop potential solutions may be a better way of eliciting input than a more formal process.
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>The best way for parties to engage in the development of a modification is through the Working Group as this is where requirements should be discussed and agreed.</li> <li>The Working Group seems to be well attended whereas most refinement consultations seem to have poor response rates; this may be because people feel they have expressed their opinions in the Working Group meetings.</li> <li>The SEC has many Parties, but most don't seem to be directly engaged in the change process, and we need to understand why that is.</li> <li>We need to get other parties engaged, especially those with technical expertise – otherwise the burden of progressing change tends to fall on the more engaged parties (often large suppliers and</li> </ul>

Question 8		
Respondent	Category	Response and rationale
		<p>some Network Operators) which results in a cost to those parties, and might not result in optimum solutions.</p> <ul style="list-style-type: none"> <li>It is not clear what value report consultations really have – especially for those Parties that have a vote at the Change Board.</li> <li>It is also not clear how much attention Change Board members pay to the Report consultation responses – are they adding anything to the process and informing decision making? The response rates from small suppliers and Other SEC Parties tend to be low, how do the representatives of those constituencies device how they will vote in the interests of their constituents if not via the report phase.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	<p>Working Group, consultation process and the sub-committees have provided the main methods by which Parties have engaged with the Change process. The recent travel restrictions have resulted in most meetings being held online, so would appear to have provided a good opportunity to engage more widely across industry without the attendant travel costs being incurred. We believe that further engagement should have been possible more widely using the online platforms, especially with smaller suppliers.</p>
<b>Utilita</b>	Large Supplier	<p>We agree with the points raised by SECAS. Firstly, on the lack of value in the short second consultation in the Report Phase, but we believe this needs to be treated case by case, as a second consultation may be necessary. For example, SECMP0015 going out for consultation (for a third time) due to implementation date change and a clearer breakdown in costs.</p> <p>In general, the most important aspect of the process is to constructively involve all Parties. This should come in the form of ensuring they are prompted where appropriate and that information is pushed to them as conveniently as possible. The most efficient way of doing this appears to be digital, portal type solutions may also be worth exploring. Alternate solutions may bring extra benefits such as easier measurement of Party engagement (i.e. tracking who has seen specific prompts, pushing alerts to them when time frames are expiring, encouraging engagement through automated reporting etc.)</p>



Question 8		
Respondent	Category	Response and rationale
		<p>Expanding the options as to how a SEC Party inputs their feedback on a mod is important. Some SEC Parties require a solid paper trail and others are able to feed in through other digital methods. Broadening the scope may encourage more parties to feed into the process.</p> <p>Ultimately, SECAS can only do so much in ensuring Parties provide feedback. If SECAS ensure that Parties are made aware of where opportunities exist to give feedback, it is then up to individual Parties to ensure they engage with the process. This is about ensuring SECAS do as much as they can to ensure themselves that Parties are aware that their feedback is expected. This should both lead to increased levels of feedback, but it should also shift some of the burden of responsibility away from SECAS and on to Parties.</p>

## Question 9: Should the number of and/or timescales for consultations be reduced?

Question 9			
Respondent	Category	Response	Rationale
<b>OVO Energy</b>	Large Supplier	-	By the time the Modification Report Consultation stage is reached, we view this to be less of a consultation and more of an indicative vote. This relates to our response to question 8 that the working group consultation is key to developing and refining the solution.
<b>Waters Wye Associates</b>	N/A	-	-
<b>Western Power Distribution</b>	Network Party	Possibly	Due to the wide variety of changes that can be raised under the SEC we believe that there needs to be flexibility with consultations, with some modifications benefiting from several refinement consultations prior to proceeding to vote. We feel that there could be a request for information type consultation used more in the initial stages of some of the more complicated changes. We wonder if the refinement consultations could also ask questions around whether it is felt that the change is ready for vote and what your vote might be so that the Working Group can gain a clear understanding of industry views and complete additional development work prior to issuing the Modification Report Consultation.
<b>E.ON Energy Solutions Limited</b>	Large Supplier	-	The second consultation could perhaps be replaced by a meeting people can attend and indicate their support for the proposal and provide detail of any challenges they have. This would allow for real-time feedback and provide the opportunity for comments to be resolved straight away rather than delaying things further.
<b>EDF Energy Customers Ltd</b>	Large Supplier	Yes	<ul style="list-style-type: none"> <li>The amount of time allowed for a report consultation could be reduced – especially where a change appears straightforward.</li> <li>The timescales for refinement consultation could probably be reduced as well.</li> </ul>

Question 9			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> <li>There needs to be a clear rationale for issuing a consultation and it must be ensured that it will add value to the decision-making process – there is no point in issuing a refinement consultation just because the SEC says you must.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	No	We do not feel the need to respond to all refinement consultations, so perhaps there is scope for some reduction. However, we realise this may not allow all parties not attending Working Group to feed their views into the process.
<b>Utilita</b>	Large Supplier	Yes	<p>Reducing the number of consultations is preferable. The number of modifications dealt with by a single consultation could be weighted according to its impact. For example, modifications that result in DCC system changes could require two consultations (an initial one and a second one in the Report Phase), while less impactful ones could be dealt with more swiftly in a single consultation.</p> <p>Instead of only looking to reduce number and timescales, it would be preferable to look at the quality of questions asked to SEC Parties. This could mean to replace the ten standard questions that are commonly asked (e.g. “Do you approve of the implementation approach?” etc) with questions that are more refined and aimed at the issue at hand. Greater attention could then be given toward a single consultation in order to generate a wider response from SEC Parties, potentially obligating SEC parties to respond where appropriate.</p> <p>The timescale for consultations is fair as there are often many stakeholders that a respondent needs to engage with before responding. Increasing this to more than 15 days seems to be unnecessary, however, only in extremely urgent circumstances should respondents be given less than 2 working weeks to work on a response.</p> <p>In addition to addressing the number and timescales of consultations, higher participation and therefore relevance could be achieved by a formally managed process for Parties’ responses. While we sometimes receive feedback on our responses, there appears to be</p>

Managed by



Question 9			
Respondent	Category	Response	Rationale
			no provision for how consultations responses are processed and taken forward. This leaves SEC Parties with no knowledge if their opinions have been heard and taken into account. There could be added value in adopting a similar process to that of the MRA code, for example by ensuring that comments from consultation responses are answered by the proposer or SECAS before a Change Board vote. This will help prevent misunderstandings or highlight where further investigation or discussion is still needed (see for comparison MRA code MAP17).

## Question 10: How do you believe the business case for changes could be better developed?

Question 10		
Respondent	Category	Response and rationale
<b>OVO Energy</b>	Large Supplier	<p>We think that the earlier stages should have greater engagement across Industry to start to understand the extent of the impact. We suggest that based on our own experience with other Codes, wider discussion aids the ability to assess the scale and articulate the benefits and implications of no action.</p> <p>We believe that potentially providing Parties with impact sizing scales will assist with providing indicative impact and aid a fuller business case. This could be a standard set of criteria that can be selected, and we propose this could be requested as part of the working group consultation.</p>
<b>Waters Wye Associates</b>	N/A	<p>Ensure thorough examination of the solution occurs at workgroups meetings to allowing attendance by all interested parties.</p>
<b>Western Power Distribution</b>	Network Party	<p>We believe that the business cases in a lot of instances do not demonstrate a clear cost benefit analysis, and that where there are significant costs, details of the benefits need to be drawn out to justify the change.</p> <p>We appreciate that there is currently some work happening in this area and that it is a difficult area. We wonder whether having different ranges for costs and benefits would help encourage people to detail the impact on them without having to provide some specific values. Or possible this could be something that the Working Group need to consider and agree on.</p> <p>We agree that this is an area that definitely needs improving.</p>
<b>E.ON Energy Solutions Limited</b>	Large Supplier	<p>The business case discussion should be a key part of the working group meeting – on a par with requirements development when it comes to importance. Again, a workshop approach to developing this with all parties involved could be helpful. Where some costs and benefits are commercially sensitive, the categories could be agreed in the group and then parties could share the figures individually with SECAS which can then feed them into the CBA. This has worked well in the past.</p>

Question 10		
Respondent	Category	Response and rationale
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>It feels like it is almost impossible to construct a robust business case for any technical change, especially one that impacts the DCC, based on an assessment of the costs and benefits.</li> <li>It is almost impossible to get an accurate assessment of the costs from the DCC or from SEC Parties as we don't usually incur costs on a per change basis – we incur costs for developing and implementing a new version of DUIS/SMETS, which we would never bother to do for a single change.</li> <li>It is not only hard to quantify the costs of making any change, but also the benefits; it is often hard to quantify the impact of a problem (such as a risk to data privacy or data on a GPF going out of date as seen in recent changes) in a quantifiable way that justifies the cost of change.</li> <li>Constructing a business case is made harder by the usually high DCC costs for any change – the bar for benefits tends to be set quite high which means that it can be hard to justify changes that would probably have a benefit if they were implemented.</li> <li>There is a risk that we will be learned to live with suboptimal device and system functionality because it is too expensive to make them work properly.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	<p>We feel that costs and benefits are not always held up to scrutiny, especially for the more expensive Modification Proposals. It is not always clear whether the benefits to Parties are in any way reflective of their contribution to the costs of change.</p> <p>We note that other industry codes have adopted a User Pays approach. While we do not advocate for such an approach here, there needs to be some consideration as to whether the benefits fall to those organisations being asked to fund them. Therefore, some independent scrutiny of the cost/benefits case may, at times, be desirable.</p>
<b>Utilita</b>	Large Supplier	<p>Utilita agrees with the feedback from the Authority in MP0067, specifically, the business case for change needing to provide a clear narrative and understanding of the weight of each modification. Therefore, it is vital that no modification is raised without having a well-constructed case for change against which the IA can be assessed. Without a clear case for change, SECAS should challenge why a modification is proposed.</p>

Question 10		
Respondent	Category	Response and rationale
		<p>Based on these concerns raised by the Authority, we support efforts to improve the business case for change. A solution is needed to prevent modifications progressing where there is a lack of fundamental detail. This could be better managed by SECAS developing a project management solution (mentioned in Q1). A project management tool should better define each stage that needs to be completed before a modification progresses along the framework. This could help to draw out a step by step plan for SECAS to measure against.</p> <p>For Example:</p> <ul style="list-style-type: none"> <li>• Stage 1: Initiation – define goals</li> <li>• Stage 2: Plan – develop business requirements, cost/benefit and timelines</li> <li>• Stage 3: Execution – action plans made (e.g. sub-committee with clear agenda)</li> <li>• Stage 4: Closure – analyse results, summarize key findings and learning and plan next steps.</li> </ul> <p>Building a strong business case for change should be under the supervision and support of SECAS so that each framework can do their role effectively, without delay or pushback.</p>

## Question 11: How do you believe DCC cost governance could be improved

Question 11		
Respondent	Category	Response and rationale
<b>OVO Energy</b>	Large Supplier	<p>We support continued and increased transparency of DCC costs. We view this has interdependencies with the approach outlined in our responses to the development of alternative solutions, greater breakdown of costs and increased engagement across Industry.</p> <p>We would be interested to understand the costs for Self-governance Modifications that have been previously approved, to form a view on re-assigning to Authority Determination where it could exceed a threshold.</p>
<b>Waters Wye Associates</b>	N/A	-
<b>Western Power Distribution</b>	Network Party	<p>The SEC is like no other code given the relationship with the DCC and the costs of changes to their systems. We feel that the IAs still lack some transparency with costs. We are also concerned with the difference in costs detailed between the PIA and the FIA which can almost render the PIA pointless. Perhaps there should be a threshold whereby the FIA costs need to be within a tolerance of the PIA costs and if it exceeds this, another consultation is required to ensure that industry still feel that it is acceptable.</p> <p>We also wonder if it is appropriate to sign off on Self Governance changes irrespective of the costs associated to it or if there should be a threshold above which would turn it to an Authority determined change.</p> <p>Whilst we understand the requirement for changes to be costed as if they are going into a standalone release, we question if this is the most appropriate method or whether the DCC should also provide a more realistic cost based on other changes being within the same release.</p>
<b>E.ON Energy Solutions Limited</b>	Large Supplier	<p>We support the review of DCC costs for impact assessing and for delivering SEC modifications and recognise the impact DCC costs have had on the delivery of SECMP0015 (see answer to question 1). Improving DCC cost governance needs to be an essential outcome of this review. The Review should also</p>



Question 11		
Respondent	Category	Response and rationale
		include whether further detail and justifications the DCC should provide on costs should be added to the SEC.
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>In our view the detail isn't the biggest problem – it is the level of the costs that is the issue; we only really need a breakdown to try and find out why the costs are so high in the first place.</li> <li>High DCC costs are becoming a barrier a change as it makes it hard to create business cases for changes that appear quite sensible – like SECMP0015 or SECMP0056 (and many others).</li> <li>Requiring high cost changes to be Authority Determined isn't going to address the root problem of being able to justify costs, it is likely to add further delays to a change process that is already too long in most instances.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	We believe that costs that are being voted on in Change Board should be reflective of the costs that Parties will bear for the change. This is not always true of the current process. Large costs also have a commercial impact on individual Parties, so we believe there is a case for a threshold beyond which any change should be Authority determined.
<b>Utilita</b>	Large Supplier	<p>This question should be broadened to look at DCC and SECAS governance regarding cost, as both set of costs must be accounted for in the modification process. Currently, there is little motivation or clear governance to work towards improving cost benefit for Parties. The reason why costs are so high has never been completely clear and DCC internal costs receive little challenge. The scale of DCC costs is significantly higher than that resulting from modifications made under other energy codes. We question whether this is due to the lack of genuine competition or intervention.</p> <p>Possible ways to improve this could be:</p> <ul style="list-style-type: none"> <li>to incentivise SECAS, this could encourage SECAS to further progress the delivery of each mod, or where issues arise SECAS are acknowledged for fairly challenging the DCC in cost and effectiveness.</li> </ul>

Question 11		
Respondent	Category	Response and rationale
		<ul style="list-style-type: none"> <li>• to create of a process for contract procurement of the SEC, similar to the structure behind the REC Code Manger Services.</li> <li>• Introduce checkpoints into the modification process whereby the costs are scrutinised i.e. as a specific 'agenda' item at a Working Group.</li> <li>• Require DCC to provide Minimum Viable Product (MVP) costs plus additional costed options (albeit these may be caveated and estimated) at each stage of cost request.</li> <li>• Require SECAS scrutiny of DCC costs, challenging DCC and DCC Service Provider costs, and working with DCC to understand parameters of Business Requirement interpretation and shifts, e.g. if another similar solution could deliver the same benefits at a lower cost but was not explicitly requested by industry, SECAS should take the initiative and lead on representing industry to come up with other ways to achieve the solution.</li> </ul>

## Question 12: How do you believe final decisions on modifications should be made?

Question 12		
Respondent	Category	Response and rationale
<b>OVO Energy</b>	Large Supplier	We think that there be merit in reviewing the decision process however we think this cannot be done in isolation without considering charging methodology for example.
<b>Waters Wye Associates</b>	N/A	-
<b>Western Power Distribution</b>	Network Party	<p>We don't necessarily believe with the statement 'this group is rarely involved in a modification prior to the final vote' as we are aware that Change Board members have been actively involved changes, or possibly a colleague has and therefore they have had some sight of the development. We believe that the Change Board members are representative of industry and would expect certain members to gain feedback from their constituents if they are representing a number of Parties in one category.</p> <p>We feel, based on the previous SEC Section D review that trying to gain enough feedback from enough industry participants to vote in another way, via consultation for example, would be challenging, especially as some might be minded to not respond if the change didn't impact them.</p>
<b>E.ON Energy Solutions Limited</b>	Large Supplier	We believe final decisions on modifications should be made by the existing Change Board. However, having the Working Group specialists for each SEC MOD may allow for further clarification and debate.
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>• We do not believe that that there are any material issues with the way decisions are made currently.</li> <li>• However, we would have no issue with every party getting a vote within their constituencies – but the weighting across the constituencies should be retained to avoid undue influence by a large number of small parties.</li> <li>• Digital voting could be used but would remove the debates that take place and which can influence decision making – in some cases we have changed our mind on how to vote (or have supported referring back to the Working Group) as a result of Change Board discussions.</li> </ul>

Question 12		
Respondent	Category	Response and rationale
		<ul style="list-style-type: none"> <li>It is not clear what the role of the Change Board would be in everyone had a digital vote.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	We believe that a decision making authority is required, and by and large the Change Board functions in that respect. Some additional reflection of smaller Parties' views is desirable, but difficult to see how the voting process could be made fairer or more transparent.
<b>Utilita</b>	Large Supplier	<p>Keeping the final decision within the Change Board alone is a straightforward solution. This should not be extended to any other committee or delegates as this diminishes the value of having a clear framework in place.</p> <p>Including other methods to voting, such as digital voting, may be worth pursuing in the future. However, digital voting will only work if all the necessary information is accessible for the Change Board to make an informed decision. At present we do not believe all modifications are fully developed before reaching Change Board therefore other voting option may not highlight the missing gaps in the modifications during voting process.</p>

## Question 13: Should the legal text for a modification be amendable after the final decision?

Question 13			
Respondent	Category	Response	Rationale
<b>OVO Energy</b>	Large Supplier	-	The legal text can be amendable however this needs to follow due diligence and there must be transparency to industry to enable comment and agreement. This is to ensure that the intent remains as developed and previously agreed and that this does not introduce material impacts.
<b>Waters Wye Associates</b>	N/A	-	-
<b>Western Power Distribution</b>	Network Party	Possibly	<p>This is a difficult question to answer. Our initial view is no, once it has been approved that should be the final decision.</p> <p>However, we appreciate that as the DCC get into the technicalities of the design and build there might be minor amendments required to technical documentation. We are open to suggestions around a strict governance process that would allow for minor changes to be made, approved appropriately and distributed to industry, in a timely way that will not negatively impact industry. However we believe that this should certainly be by exception rather than expected behaviour.</p>
<b>E.ON Energy Solutions Limited</b>	Large Supplier	Yes	This feels like a sensible approach which should save time and effort. To avoid any undesirable changes, the amended legal text should have to be approved by an appropriate governance group (e.g. CSC or SEC Panel).
<b>EDF Energy Customers Ltd</b>	Large Supplier	Yes	<ul style="list-style-type: none"> <li>Needing to raise further changes to correct non-material errors is inefficient and unnecessary – a process to enable such changes to be made and for parties to highlight any impacts would be preferable.</li> </ul>

Question 13			
Respondent	Category	Response	Rationale
ScottishPower Energy Retail Ltd	Large Supplier	No	The legal text and solution carry a cost and the Change Board votes on that cost. Any legal text changes could lead to a cost reduction, which requires to be reviewed by the change process. In at least one recent Modification Proposal we believe that a post decision scope change potentially carried a cost reduction, but we are unsure of how that was dealt with.
Utilita	Large Supplier	Only in correcting typos	Modifications should not need amending after final decision, as we expect SECAS to have examined the legal text carefully, before reaching Change Board for final decision.  However, SECAS should use common sense to make nonmaterial changes (such as, typographical errors) if needed that saves additional change and unnecessary effort. A record of these changes must be kept as a reference in case this creates further issues that may need explaining.

## Question 14: Should a more flexible approach to setting the implementation date for a modification be allowed?

Question 14			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	-	We can see there could be benefit however this would need to be transparent and carefully managed. We think this would need to follow a defined process with governance for engagement and agreement from affected Parties.
Waters Wye Associates	N/A	-	-
Western Power Distribution	Network Party	Possibly	<p>We agree that there might be some benefit to this proposal, potentially allowing some cost savings where the DCC can group modifications together, however there needs to be strict rules around this, allowing for impact to users.</p> <p>There also needs to be a better understanding, particularly from the DCC, as to what is User impacting as whilst it might not appear to directly impact a User or their systems, if a user feels that they need to make changes internally then there still needs to be enough lead time to allow this.</p>
E.ON Energy Solutions Limited	Large Supplier	Yes	To be more efficient, a flexible approach to setting the implementation date would be preferred.
EDF Energy Customers Ltd	Large Supplier	Yes	<ul style="list-style-type: none"> <li>We agree that the implementation process needs to be more flexible to enable changes to be implemented in the most efficient manner, and at the lowest possible cost.</li> <li>The current process of targeting changes for the next available release is not really aligned with the way that the Technical Specifications and the DCC systems should change in the future.</li> </ul>

Question 14			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> <li>This approach is likely to lead to releases which contain small number of relatively immaterial changes – if this is the case then parties (and especially suppliers) are unlikely to see a benefit to upgrading to those new versions.</li> <li>There is almost always a significant time lag between a technical SEC change being implemented, and SEC Parties actually implementing those changes, for example in the form of new devices.</li> <li>Upgrading to a new version of SMETS or DUIS is a complex and costly undertaking that takes a lot of time and effort – suppliers will only undertake those upgrades if there is a very significant benefit to doing so, or if they are mandated to. Any mandate would then need to be supported by a clear business case.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	No	<p>We agree some flexibility should be afforded to the implementation of a Modification, provided it is only by a week or two, as this will mitigate against any unexpected issues discovered during build and test. However, we do not agree, for example, that a change planned for a November Release should be delayed, without consultation and broad agreement, to the June Release as the costs could be significantly different and require review. It is also worth noting that any significant change to an implementation date could also affect Party costs and plans, which may have factored in the original Change Board vote.</p>
<b>Utilita</b>	Large Supplier	Yes, if it is required and determined by industry	<p>We recognise there are occasionally delays that are beyond control. Therefore, a process needs to be created before setting up a flexible approach for implementation dates.</p> <p>This process should only be required and determined by industry. A clear business case for each change should be provided to help industry understand the reason/benefit for change. This process should consider the timely need for a solution, the changes in cost, the impact this will have on the Energy Consumer and clear reasoning for moving for the</p>



Question 14			
Respondent	Category	Response	Rationale
			<p>implementation date. SECAS should present a recommendation based on feedback and assessment done and then put it to the Change Board for final decision.</p> <p>We are hesitant to agree to this implementation date approach where the DCC or Service Providers are steering the change, as this will only encourage delays in reaching targets at a cost to DCC Users. Where this is the case rationale should be given for assessment and/or potentially feeding into the Operational Performance Regime.</p>

## Question 15: How can SEC Release governance be improved?

Question 15		
Respondent	Category	Response and rationale
<b>OVO Energy</b>	Large Supplier	We support increased engagement in determining the scope of a release and any changes to the inclusion or delivery elements in that. We view that there needs to be increased communication from DCC for the deliverables within a specific release that is separate to the SEC Panel Release Implementation Document i.e. a DCC Release Note.
<b>Waters Wye Associates</b>	N/A	-
<b>Western Power Distribution</b>	Network Party	<p>Generally we find the SEC documentation easy to find and navigate. It would be really helpful if under the SEC documentation on the website there was the option to sort by date under each of the tabs so that you can locate all the newly updated documents easier.</p> <p>We do feel that final legal text for a modification could be easier to identify as it is not always clear if it is as per the wording in the MRC of if there have been changes so a final redlined legal text document on the modification pages would be useful.</p>
<b>E.ON Energy Solutions Limited</b>	Large Supplier	No comments on SEC Release Governance.
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>The SEC change process, including the process for including changes in SEC releases, needs to be better aligned to the way that smart metering technology evolves over time, and should be looking at how new capabilities and services can be delivered in the future. The current process seems to focus on piecemeal changes that address issues in the current specifications rather than creating new capabilities that would benefit consumers.</li> <li>The SEC release strategy could be better optimised to deliver changes when people will actually want to or be able to use them, rather than being driven by a fixed release calendar.</li> </ul>

Question 15		
Respondent	Category	Response and rationale
ScottishPower Energy Retail Ltd	Large Supplier	We believe the gating steps set by the change governance should be followed without exception. Changes in scope or implementation after Change Board vote should always be referred back to the Change Board. By this token we do not believe costs should be recovered through the Modification process after they have already been incurred.
Utilita	Large Supplier	No further comments

## Question 16: Please provide any further comments you may have

Question 16		
Respondent	Category	Comments
<b>OVO Energy</b>	Large Supplier	<p>We would welcome further work to establish how changes DCC make, such as those to the SSI, that then have a requirement to update a clause of wording can be achieved without the need to invoke the full SEC Modification process.</p> <p>A current example of this is MP109 ADT and Exit Quarantine file delivery mechanism. The purpose of allowing the DCC to drive forward SSI changes was to better facilitate the speed around these changes, however the Modification process then increases the timescale for delivery.</p>
<b>Waters Wye Associates</b>	N/A	-
<b>Western Power Distribution</b>	Network Party	<p>There is one other area that has come to light that we feel needs addressing and that is changes that impact both the SEC and the SSI. Whilst pulling the detail of the SSI out of the SEC allows for a more flexible change process to the SSI, where a change impacts both the SEC and the SSI this change needs to go through two change processes simultaneously which can be challenging. Therefore whilst we don't agree with needing a SEC modification for every SSI change, we wonder if SSI changes that also need a SEC modification should just have those changes addressed through the SEC modification process.</p>
<b>E.ON Energy Solutions Limited</b>	Large Supplier	None.
<b>EDF Energy Customers Ltd</b>	Large Supplier	<ul style="list-style-type: none"> <li>As previously noted, the SEC change process has improved over time, however further improvements could be made to reduce the administrative burden on SEC Parties and improve the timeliness of the process.</li> <li>Further discussion is required around how business cases for changes can be constructed in an accurate and robust manner given the challenges we have detailed above – the nature of the way technical changes are developed and implemented makes assessing the costs very difficult, a way</li> </ul>

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		<p>needs to be found to ensure that changes can be progressed with the confidence that consumers will benefit as a result.</p> <ul style="list-style-type: none"> <li>The SEC change process is still largely based on the way that industry code changes have been developed and implemented for many years, which is not optimal given the technical nature of the code and the devices it covers. The need to manage changes to millions on meters, as well as the central systems that communicate with them, and to manage a complex ecosystem of device types and versions, probably requires a different way of thinking about change while still rerating the core principles of change being driven and agreed by industry parties.</li> </ul>
<b>ScottishPower Energy Retail Ltd</b>	Large Supplier	-
<b>Utilita</b>	Large Supplier	<p>Utilita welcomes the opportunity to review the overall approach to and development of the Modification Process. In hosting a review of this size, it is important to also include broader questions so that change at all levels of impact can be noted and examined with diligence.</p> <p>The Smart Energy Code both supports and facilitates the industry to become effective and cost efficient as possible.</p> <p>Fundamentally, general management and administration of the SEC can be further improved. As detailed in some of our answers above (Q1 and Q10), a more robust and standardised project management style approach should be undertaken. Specifically:</p> <ol style="list-style-type: none"> <li>1. Creating developed objective /goals,</li> <li>2. Defining scope or what is not in scope in the SEC Modification process</li> <li>3. Highlighting priorities, risks and assumption made,</li> <li>4. Outline the task (who's involved or not involved), and appropriate timelines</li> <li>5. Maintaining strong communication with stakeholders</li> </ol>

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		<p>6. Challenge the cost-effectiveness of the solution</p> <p>Following on the theme of improving general management, there is capacity for delivering a modification process that offers appropriate timescales and creation of fully developed modifications. We believe that this could be taken forward effectively by developing an incentive mechanism for SECAS in delivering the modification process. Incentives emphasize where improvements can be made and helps demonstrate clearly where any delays or process benefits arise. Incentives can take many forms such as bringing the administrative role of SECAS under a contract renewal or a simple monetary bonus.</p> <p>Throughout our response above, and in our recent submission to the REC consultation we have made comparisons with other codes, to deliver best in class across the piece. This is important in order to develop best practice and maintain good governance.</p> <p>We reflect, for example, on the requirements under the BSC for a three-year limitation to be placed on the term of key industry 'officers'. We believe that as with corporate auditors, a regular refreshment of outlook brings benefits to the quality of governance and oversight of key processes, which are essential to industry.</p> <p>These comments are not in any way intended to reflect on any current incumbents under the SEC, but instead are proposed as reasonable checks and balances, that should properly be in place wherever monopoly services are received. These are good and robust practices to avoid the equivalent of 'regulatory capture' for the networks.</p> <p>We strongly encourage considering arrangements that work well under other codes to reduce the barriers to change and innovation which we believe exists today.</p>

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		We would be happy to talk through our suggestions with SECAS as we believe this is a vital opportunity to take a completely fresh and more efficient approach to change management and issue resolution under the code.